



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

Brendan J. O'Rourke
Member of the Firm
d 212.969.3120
f 212.969.2900
borourke@proskauer.com
www.proskauer.com

October 21, 2016

Via ECF

Hon. U. S. D. J. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: Triangl Group Limited et al v. Jiangmen City Xinhui District Lingzhi Garment Co., Ltd. et al, 1:16-cv-01498-PGG

Dear Judge Gardephe:

We are counsel to Plaintiffs Triangl Group Limited, Triangl International Limited and Triangl Limited (collectively, "Triangl") in the above-referenced matter. In its October 11, 2016 Memo Endorsement (Dkt 21), the Court directed Triangl to inform the Court if service is effected prior to the December 15, 2016 initial pretrial conference.

Triangl still has not yet received official confirmation from the People's Republic of China Ministry of Justice ("MOJ") that any of the Defendants were served. However, it appears that service was completed on Jiangmen City Xinhui District Lingzhi Garment Co. Ltd. ("Lingzhi"), Ou Farong and Chen Zhimei, as they mailed to the Court what purports to be an "Answer to Civil Complaint." Dkt 22. It does not appear that they have retained counsel to represent them. Triangl does not have any further information concerning the status of service of process of MG Industrial Co., Ltd. and Jeff Xue, the other two named Defendants. The MOJ has promised to provide confirmation of service of process for all of the named Defendants as soon possible, and Triangl will update the Court accordingly.

In the meantime, given that it appears Lingzhi, Ou Farong and Chen Zhimei have been served, Triangl will endeavor to contact them to discuss the joint letter and Case Management Plan that the Court's Notice of Pretrial Conference (Dkt 17) requires the parties to submit in advance of the initial pretrial conference. Triangl has already provided them with a copy of the Court's Notice of Pretrial Conference, and will also provide a copy of the Court's recent order (Dkt 21) rescheduling the conference to December 15.

Finally, while Triangl does not intend to respond at this juncture to all of the false claims made in the "Answer to Civil Complaint," Triangl does wish to briefly reassure the Court that this is not a case of mistaken identity. Lingzhi, Ou Farong and Chen Zhimei deny any connection to or knowledge of the Brakinis and Vossue "brands" that have repeatedly knocked off Triangl's bikinis. See Dkt 22 at 3-4. This claim is patently false and easily contradicted. Ou Farong and Chen Zhimei concede they are principals of Lingzhi (Dkt. 22 at 4-5), and *Lingzhi's own*

Proskauer»

Judge Gardephe
October 21, 2016
Page 2

corporate website – prclingzhi.com – currently features numerous Brakinis products that Lingzhi makes and offers for sale (including many infringing products), as shown in the enclosed representative screenshots taken yesterday. At the appropriate time, Triangl will present a mountain of other evidence linking each of the Defendants to the unlawful conduct described in Triangl’s complaint and otherwise debunking the many false claims in their “Answer to Civil Complaint.”

Respectfully submitted,

/s/ Brendan J. O’Rourke
Brendan J. O’Rourke

Enclosure

Cc: Jiangmen City Xinhui District Lingzhi Garment Co. Ltd.
Ou Farong
Chen Zhimei

BACK

FASHION APPAREL

时尚潮流——凌志服装

Jiangmen Lingzhi Garment Co., Ltd.

Address: Jiangmen City Xinhui District towns Ling Town Street on the 29th (ie, spiritual town house diagonally opposite)

Phone: +86-750-6136909

TEL : +86-13356567918 Atten: Tracy

Fax: +86-750-6136909

E-mail: lingzhi-wing@163.com



了解凌志 ABOUT LINGZHI >

最适合您的泳衣 OUR PRODUCTS >

合作加盟 JOIN US >

我们的位置
OUR LOCATION



Copyright © 2014 Jiangmen Lingzhi Garment Co., Ltd. 粤ICP备14047288号 Prowed by 300.cn

BACK

FASHION APPAREL

时尚潮流——凌志服装

Category one

Category two

Page shows the number of 16 5

first previous 1 2 3 4 5 6 7 8 next last



23款

Price: 0.00

Retailing Price: 0.00



19款

Price: 0.00

Retailing Price: 0.00



22款

Price: 0.00

Retailing Price: 0.00



18款

Price: 0.00

Retailing Price: 0.00



21款

Price: 0.00

Retailing Price: 0.00



2803

Price: 0.00

Retailing Price: 0.00



20款

Price: 0.00

Retailing Price: 0.00



2802

Price: 0.00

Retailing Price: 0.00



了解凌志 ABOUT LINGZHI >

最适合您的泳衣 OUR PRODUCTS >

合作加盟 JOIN US >

我们的位置
OUR LOCATION

Copyright© 2014 Jiangmen Lingzhi Garment Co., Ltd. 粤ICP备14047288号 Prowed by 300.cn

关闭



Product Name: 2601 Fluorescent orange
Product No.: A2601
Price: 0.00
Retailing Price: 0.00

Details Parameters



Browse similar products

Previous 2602 Blue and green

Page: Next: 2203 Fluorescent orange

关闭

Product Name: 8601 Green
Product No.: **A8601**
Price: ~~0.00~~
Retailing Price: 0.00

Details Parameters



Browse similar products

Previous 8602 Rose Red

Page: Next: 8502 Black square dots



Product Name: 2803
Product No.: A2803
Price: 0.00
Retailing Price: 0.00

Details Parameters



Browse similar products

Previous 18款

Page: Next: 2802

关闭

关闭



Product Name: 2705
Product No.: A2705
Price: 0.00
Retailing Price: 0.00

Details

Parameters

Browse similar products

Previous 2706

Page :

Next : 2702

关闭



Browse similar products

Previous 2603 Pink

Page: Next: 2601 Fluorescent orange

Product Name: 2602 Blue and green

Product No.: A2602

Price: 0.00

Retailing Price: 0.00

Details

Parameters

关闭



Browse similar products
Previous 34款波西米亚风
Page: Next: 37款

Product Name: 39款
Product No.: 39款
Price: 0.00
Retailing Price: 0.00

Details

Parameters